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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JACOB SABATINO, individually, and on
 behalf of all others similarly situated,

Plaintiffs,

vs.

UBER TECHNOLOGIES, INC., a Delaware
 corporation; RASIER, LLC, a Delaware
 limited liability company; RASIER-CA, LLC,
 a Delaware limited liability company;
 RASIER-DC, LLC, a Delaware limited
 liability company; RASIER-PA, LLC, a
 Delaware limited liability company; and DOES
 1 to 25, inclusive,

Defendants.

Case No. 3:15-cv-00363-JST

**DECLARATION OF JUSTIN N. OWENS
 IN SUPPORT OF STIPULATION TO
 EXTEND DATES FOR CASE
 MANAGEMENT CONFERENCE AND
 RULE 26 OBLIGATIONS PENDING
 DEFENDANTS' MOTION TO STAY
 PROCEEDINGS PENDING
 ARBITRATION**

Action Filed: January 26, 2015

1 I, Justin N. Owens, hereby declare as follows:

2 1. I am an attorney at law, admitted to practice in the United States District Court,
3 Northern District of California, and I am an associate with the law firm of Irell & Manella LLP,
4 counsel for Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC, Rasier-DC, LLC,
5 and Rasier-PA, LLC ("Defendants").

6 2. I have personal knowledge of the facts set forth below, and if called upon to testify,
7 could and would competently testify thereto.

8 3. I make this declaration in support of the Parties' stipulation to extend dates for the
9 case management conference and Rule 26 obligations pending Defendants' Motion to Stay
10 Proceeding Pending Arbitration.

11 4. On January 26, 2015, Plaintiff filed his putative class action complaint against
12 Defendants. Dkt. No. 1.

13 5. On February 18, 2015, the Court ordered this case related to *Pappey v. Uber*
14 *Technologies, Inc.* (United States District Court, Northern District of California, San Francisco
15 Division, Case No. 3:15-cv-00064-JST) and *Philliben, et. al v. Uber Technologies, Inc. et. al*
16 (United States District Court, Northern District of California, San Francisco Division, Case No.
17 3:14-cv-05615-JST). Dkt. No. 23 in Case No. 14-cv-05615-JST. This case was reassigned to this
18 Court on February 19, 2015.

19 6. On March 23, 2015, Defendants filed their Motion to Stay Proceedings Pending
20 Arbitration, with a hearing date of May 21, 2015. Dkt. No. 27.

21 7. The Court has set a date of April 15, 2015 for the initial case management
22 conference in this matter, and the Parties' joint case management statement is currently due April
23 1, 2015. Dkt. No. 25. The deadline for the conference of parties pursuant to Rule 26(f) is
24 currently March 25, 2015, which is 21 days prior to the case management conference.

25 8. In light of the foregoing, the Parties desire to conserve resources pending resolution
26 of the Motion to Stay Proceedings Pending Arbitration, including by postponing the case
27 management conference and associated deadlines, and by extending upcoming discovery
28 deadlines and obligations under Rule 26.

1 9. Pursuant to Local Civil Rule 6-2(a)(2), requiring the disclosure of all previous time
2 modifications in the case, whether by stipulation or by Court order, there have been two (2)
3 previous time modifications in this case. Dkt. Nos. 19, 26.

4 10. Approval of the Parties' stipulation will change the deadlines in the action as
5 follows:

- 6 a. The case management conference currently set for April 15, 2015, will be
7 rescheduled to 2:00 p.m. on the fifth Wednesday following the Court's ruling on
8 Defendants' Motion to Stay Proceedings Pending Arbitration (or as soon thereafter
9 as the Court is available); additionally, the Parties' deadlines under Rule 26,
10 including the conference of the parties pursuant to Rule 26(f) and initial disclosures
11 under Rule 26(a), shall be extended and all discovery stayed, and the Parties shall
12 conduct the Rule 26(f) conference at least 21 days before the rescheduled case
13 management conference.

14 Or, in the alternative:

- 15 b. The Parties' deadline for initial disclosures under Rule 26(a), and all other
16 discovery, be stayed until 28 days after Court rules on the Motion to Stay
17 Proceedings Pending Arbitration

18
19 Dated: March 24, 2015

IRELL & MANELLA LLP

20
21 By: /s/ Justin N. Owens

22 Andra B. Greene
23 A. Matthew Ashley
24 Justin N. Owens
25 Attorneys for Defendants
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